# Legend Corporate Modern Slavery Statement FY21

**DECEMBER 2021** 



### Statement from CEO and Chairman

Every day, all of us at Legend Corporation work hard on our strategic initiatives to grow our business into something we should all be proud to be associated with.

While what we achieve is important – so is how we achieve it.

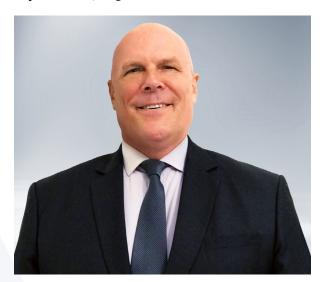
How we work is guided by our core values. They are Accountability, Teamwork, Integrity, Respect and Excellence. We are relentless in our pursuit of these values and they guide our decision making.

At Legend Corporation we are all about winning, but we care how we win. We strive for superior results through setting clear goals, defining responsibilities and being accountable for our actions. We are proud to have created a trusting, respectful and inclusive environment, where both personal and team growth, creativity and reinvention flourishes. It strengthens our relationships, builds trust in the communities we participate in and protects our business.

Our code sets a standard of behaviour and keeps us accountable. We may be tested at times, but we will not compromise on our values.

Our code has and will continue to guide us.

### Bryan Tisher, Legend CEO



### Respecting Human Rights

We must respect, and work to, uphold and advance human rights in everything that we do. We acknowledge that our activities have the potential to impact human rights and we manage this through our core business practices.

Preventing and addressing our own involvement in modern slavery is central to our sustainability approach including our commitment to running a safe, responsible and profitable business.

We set clear expectations that our employees and suppliers (including contractors and agents) should be alert to possible involvement in modern slavery and should work to prevent and address it.

We know that adopting high standards is not enough. Knowledge sharing, such as targeted training programmes for employees, and action, including mitigation measures where we see a risk of involvement, are vital to ensure our work stays effective.

**Bryan Tisher, Legend CEO** 

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Andrew Bullock, Legend Chairman of the Board

17th February 2022

### **Executive Summary**

People are the heart and soul of any business and people are the reason for which any business exists. Legend is committed to people- all people. It is committed to its customers, its employees and to the larger community in which we operate as we create value for our stakeholders.

So we continue to pursue our commitment to eradicate modern slavery from our supply chain and operations wherever find it or suspect it to be. We are building a risk management system to prevent it from entering our business and our business relationships through a vigorous and vigilant Modern Slavery Acton team and a comprehensive range of measures which are being woven into the fabric of our organisation.

Much has happened over the past twelve months since we reported our first Modern Slavery statement. We are sure that this statement will show this and highlight those initiatives which we are turning into the new "normal" for Legend. And we hope that it will provide a glimpse into our future, as we journey along the path with many other travellers to a better, humane and just world without slavery.

This report will review and highlight the following areas.

- This year our entity structure has changed as we farewelled our Celemetrix division and we welcomed our new acquisition Acculec in May 2021.
- Each of our seven Sales Divisions, including our new Acculec division, is profiled for its respective market, important aspects of each division's operations and a description of its supply chain. The supply chain is described in terms of its total spend, products, the number of suppliers, countries of manufacturing origin and the types of characteristic relationships between our suppliers and Legend. We also note difficulties each division has faced regarding Covid -19 which have been felt mainly in the areas of transport and availability.
- We continue to support the overall business through the corporate functions of finance, operations, supply chain, people and culture and safety.
- Modern slavery risks are described and these are similar to the ones presented in our first report.
   In Operations there are medium level risks arising from being within the manufacturing sector of the

economy and by having no independent auditing of our systems for modern slavery risks. In the supply chain we also have medium level risks due to an international supply base situated in The People's Republic of China, India and Malaysia. The nature of our business has also meant that we are supplied by industries which may incorporate raw materials from suppliers which use modern slavery.

- No new risks have arisen. No actual occurrences of modern slavery have been discovered nor detected in our operations and supply chains. We also note the effect of Covid-19 on our risk management activities which has once more hampered our ability to travel and review our suppliers in countries of interest.
- The measures which we use to assess our effectiveness of our program include;
  - 1. A Modern Slavery Action Team which has an oversight function throughout the business;
  - Monitoring of media stories for possible implications for modern slavery and
  - 3. A supplier audit program within the People's Republic of China through our Legend Strategic Sourcing Office within China.
- Our consultation between the active entities remains the same as last year. We can consult across the entities through a common management structure which considers all entities in relation to the whole of the Legend business.
- Outlined is the list of active and dormant entities within our overall structure which now includes the Acculec business entities we have acquired during the reporting period.
- A list of the action items to be achieved this coming year are included which will take us into the realm of best practice for modern slavery risk management.

I am sure that over the next twelve months we will achieve an enviable risk management system with greater presence and effectiveness in managing our modern slavery risk.

**Bryan Tisher, Legend CEO** 

### **About Us**

Legend Corporation Pty Ltd (ACN: 102631087, ABN: 69 102631087) ("Legend") is an electrical products and industrial solutions supplier.

It is a market leading designer, manufacturer and distributor of products and accessories to the electrical utility, data communications and industrial gas markets. The company also engineers, tests and calibrates and manufactures integrated circuits (micro-chips) and electronic systems for electrical, defence, biomedical and other high-tech industries.

The seven sales divisions which operate within the Legend group are renowned for their best in-class customer service and exceptional ontime delivery of up to 30,000 product lines. The group employs over 320 people across Australia and New Zealand in multiple manufacturing sites, independently certified test laboratories, corporate offices and warehouse holding facilities. Legend was privatised by Australian private equity firm, Adamantem Capital, in August 2019.













### Our Structure

This Statement is made by Legend, for itself and its subsidiary companies. Legend was incorporated in South Australia and has its registered office at Hendon, South Australia.

The corporate structure of Legend is shown below. All entities shown in the corporate structure are companies and all subsidiaries of Legend are 100% owned.

In the reporting period the entity MH Legend Power was added to the group by acquisition.

**Legend Corporation Pty Ltd** ACN 102631087

In assessing and addressing the risks of modern slavery practices in the operation and supply chains of the Legend Group and in the preparation of this statement, it was not necessary for Legend to consult with the members of the Legend Group. This is because all the entities in the Legend Group have a common management structure and common management personnel with Legend. For example, the CEO and CFO of Legend are directors of Legend and are also directors of each of the entities in the Legend Group.

ACN 058 198 075 **Pty Ltd** ACN 006 722 292 **System Control Engineering** Pty Ltd ACN 082 835 292 **IES Investments Pty Ltd Hendon Semiconductors Pty Ltd** ACN 080 879 616 ACN 105 001 189 **Commsforce Pty Ltd** ACN 103 510 498 MH Legend Power Pty Ltd ACN 051 792 833 **System Control Engineering NZ Limited Co** #112889 **Ecco Pacific Limited CO** #896659 M+H Power Pacific Limited Co # 1062493 **Cable Accessories (Australia)** Pty Ltd ACN 002 184 616 **Cable Accessories (Holdings) Pty Ltd** ACN 003 213 358 **CABAC Projects Pty Ltd** ACN 117 215 415 **Circle Power Electrical Data Pty Ltd** ACN 113 923 079 **MSS Fibre Systems Pty Ltd** ACN 102 221 698 **Acculec Pty Ltd** ACN 123 199 833 **Acculec Group Pty Ltd** ACN 605 546 469 **Energy Correction Options** ACN 085 765 751

**Legend Corporate Services** 

Legend (Pacific) Pty Ltd

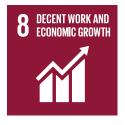
"Achieving a better and more sustainable future for all"

### Sustainable Development Goals

### **Putting People First**

Legend's work in the area of Modern Slavery supports UN Sustainable Development Goal 8 "Decent Work and Economic Growth" and its target 8.7.





### Goal 8

### Decent Work and Economic Growth

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



### Target 8.7

### End Modern Slavery, Trafficking and Child Labour

Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Legend owns and trades through 9 entities and operates 7 sales divisions through these 9 entities throughout Australia and New Zealand. The Legend business is identified with Legend Corporation Pty Ltd. (ACN 102 631 087). All of the subsidiary companies described below are operated as sales divisions of Legend and not as independent entities that Legend owns or controls.

Legend operates as one business with centralised corporate functions including procurement, accounting, operations and sales. Legend's modern slavery risk is managed at the group level for all subsidiary companies as presented in this statement.



### **CABAC**

Since 1982 we have been the benchmark for service, range & quality.

#### **DESCRIPTION OF OPERATIONS**

CABAC has 196 employees. Its head office is in Sydney with sites in Melbourne, Brisbane, Adelaide and Perth .

CABAC designs, manufactures, supplies and distributes an extensive range of over 28,000 product lines to the electrical industry which are engineered to industry standards.

CABAC promotes its products via a comprehensive national network of electrical wholesale organisations that service; engineering construction, residential, commercial and infrastructure building industries.

Established for more than 25 years, CABAC's products range include the largest range of Australian certified compliant electrical connectors, cable jointing systems, related tools, test and measurement instruments, cable management, structured wiring systems, copper and fibre connectivity, low and medium voltage power connectivity products and ancillaries.

### SUPPLY CHAIN SUMMARY

During the reporting period CABAC had a total spend of \$22M spread over 514 suppliers from 21 countries. The principal countries of supply were the People's Republic of China, India, Taiwan and Australia. The main products supplied were cabling accessories. Its supplier arrangements were mainly stable and based on long-term relationships.

In 2021 Covid-19 affected container availability, freight costs, "snap" port lockdowns particularly in China and industrial disputes.



### **System Control Engineering**

For over 50 years we have supported the gas and appliance industries.

#### **DESCRIPTION OF OPERATIONS**

SCE has 55 employees. Its head office is in Melbourne with sites in Sydney, Brisbane and Adelaide.

System Control Engineering has been an industry leader for 50 years, servicing the gas, electrical appliance spares, Heating Ventilation, Air Conditioning and Refrigeration industries. SCE also offers a specialized engineering & design service to customers who need a unique gas solution to meet stringent standards compliance and Australian conditions.

Over 15,000 product lines from global brands available through Electrical & Plumbing wholesalers, supported with online training, sales representatives and marketing material.

Continually investing in new products and innovative technologies ensures that SCE continue to offer the very best quality in products, technical support and service.

#### **SUPPLY CHAIN SUMMARY**

During the reporting period SCE had a total spend of \$27M spread over 290 suppliers from a diverse supplier base in Europe, Australia, Asia (including the People's Republic of China, and the USA. The main products supplied were gas and oil parts, appliance spares, valves, HVAC and refrigeration, its supplier arrangements were mainly stable and based on long-term relationships.



### **Legend Power Systems**

Supporting Australia's Power Industry with the right solutions and technical expertise.

#### **DESCRIPTION OF OPERATIONS**

Legend Power Systems has 10 employees. Its head office is in Sydney with sites in Melbourne, Adelaide, Brisbane and Perth.

Legend Power Systems serves Power Generation; transmission; distribution, Rail and Primary Resource Engineering markets.

Legend Power Systems supplies a wide range of proven power electrical connectivity, special tools, jointing systems and electrical safety products to meet the diverse requirements of overhead and underground power transmission and distribution.

In house NATA laboratories undertake continuous product testing to ensure product compliance with Australian standards.

Clients are served by local business development specialists further supported by a national team of product specialists and a national network of warehouses that maintain deep stock levels of required materials supported by local manufacture facilities.

Legend Power Systems also provide Specialist engineering, design and manufacture expertise in connector and tool design offering very short lead times .

#### SUPPLY CHAIN SUMMARY

During the reporting period Legend Power Systems had a total spend of \$2.7M spread over 111 suppliers from 14 countries. The principal countries of supply were Australia, the People's Republic of China, India and Italy. The main products supplied were power system components. Its supplier arrangements were mainly stable and based on long-term relationships.

Covid-19 affected its supply chain through container availability, freight costs, "snap" lockdowns at ports (particularly China) and industrial disputes.



### M+H Power

Your trusted partner for reliable hybrid & off-grid solar solutions.

#### **DESCRIPTION OF OPERATIONS**

M+H Power has 12 employees. Its head office is in Sydney.

M+H Power is a technology-led company with a long history specialising in the delivery of reliable Off-Grid power solutions for a diverse range of industries and applications.

It also includes the Bardic brand which has delivered quality emergency and exit solutions to the Australian and New Zealand market for over 40 years. Since the introduction of BARDIC, the brand has maintained a strong position in the market, designing and manufacturing various emergency lighting products from the early fluorescent lighting battens to today's LED Light Saver with lithium battery technology.

#### **SUPPLY CHAIN SUMMARY**

During the reporting period M+H Power had a total spend of \$15.4M spread over 94 suppliers from 14 countries. The principal countries of supply were the People's Republic of China, Australia, USA, Spain, Germany, Canada and Finland. The main products supplied were batteries, solar products and emergency lighting. Its supplier arrangements were mainly stable and based on long-term relationships.

Covid-19 affected its supply chain through container availability, freight costs, "snap" lockdowns at ports (particularly China) and industrial disputes.



### **MSS Data Solutions**

We make unique solutions happen.

### **DESCRIPTION OF OPERATIONS**

MSS Data Solutions has 9 employees. Its head office is in Sydney with further sites in Melbourne and Perth.

MSS Data Solutions is the established market leader in fibre optic and innovation for communications cabling, providing end-to-end solutions for the needs of any project. With 20 years of experience, we guarantee a faster, more efficient service for the enterprise, industrial and telecommunications industries across Australia and New Zealand.

MSS Data Solutions is uniquely positioned to work with our clients to deliver complete data and communications solutions through our world class products, in-house support teams and international partnerships.

#### SUPPLY CHAIN SUMMARY

During the reporting period MSS Data Solutions had a total spend of approximately \$4.2M spread over 57 suppliers from Australia, Canada, Peoples Republic of China and South Korea. The main products supplied were telecommunications infrastructure hardware and software. Its supplier arrangements were mainly stable and based on long-term relationships.

Covid -19 affected its supply chain through container availability, freight costs, "snap" lockdowns at ports (particularly China) and industrial disputes.



### **Hendon Semiconductors**

Specialised Engineering and manufacturing PCB services since 1962.

#### **DESCRIPTION OF OPERATIONS**

Hendon Semiconductor has 29 employees. Its head office and manufacturing operation is in Adelaide.

It has been a long-established integrated circuit design and wafer fabrication facility in Australia, from its Philips semiconductor background up to 1997, when the business became Integrated Electronic Solutions Pty. Ltd, to its name change to Hendon Semiconductors Pty. Ltd in 2007.

Hendon Semiconductors is a specialist electronic design and manufacturing company with expertise in:

- · Custom integrated circuit design
- Applications design including energy management, mains switching, temperature control, lighting control and switch mode power supplies
- Thick film hybrid design and manufacture
- Precision SMT manufacturing
- SMA of PCBs and modules
- Proprietary testing of all products
- Extensive quality control, life test, FMEA process

#### SUPPLY CHAIN SUMMARY

During the reporting period Hendon Semiconductors had a \$4.3 million spend across its top 10 suppliers. These suppliers are located in Singapore, the People's Republic of China, Malaysia, the USA and Australia. The main products supplied were electronic components. Its supplier arrangements were mainly stable and based on long-term relationships. Covid-19 affected its supply chain due to a 1-month shutdown of an operational facility in Asia.



### Acculec

Smart technology solutions for the power industry.

#### **DESCRIPTION OF OPERATIONS**

Acculec was acquired by Legend in May 2021.

Acculec has 24 employees. It has offices and operations in Perth and Brisbane and an office in Auckland. Acculec is a leading supplier specialising in the manufacture and distribution of quality branded products, consumables, and services to the mining, resources, construction, infrastructure, rail, electrical power utilities and manufacturing sectors. Our extensive customer base includes tier-one principals in the utility, resources, construction and infrastructure sectors. Our long-term partnerships are a testament to our impeccable customer service, focus on quality and proven dependability. Australian service suppliers to Acculec's operations were reviewed soon after acquisition and there were no adverse findings noted.

#### **SUPPLY CHAIN SUMMARY**

During the reporting period Acculec had a total spend of approximately \$2.3M spread over 22 suppliers principally from the USA, the People's Republic of China and India. The main products supplied were finished goods or partially finished goods including Surge Arresters, Insulators, Line Hardware, Voltage Regulator, Anchors, Earth rods and couplers. Its supplier arrangements were mainly stable and based on long-term relationships. Australian suppliers to Acculec's operations were reviewed soon after acquisition for modern slavery risk and there were no adverse findings.

Covid-19 affected its supply chain through changes in forecasting, bringing future orders forward, pre-booking sea-freight containers / shipments, changes to shipment out of alternative ports, consolidation of orders for sea-freight shipments and the additional use of airfreight.

# Modern Slavery Risks in Our Operations

Legend understands there is a risk that its own operations could inadvertently cause, contribute to or be directly linked to modern slavery. As part of its efforts to address Modern Slavery, risk areas have been identified and are described in the table below

Risk	Description	Finding	Our Risk Exposure
1	Casual or Contract workers engaged directly by Legend	Legend's workforce is almost all permanent, with only 4% casual and 2% contractors	Low
2	Casual workers under the age of 18	Legend has no casual employees under the age of 18	Low
3	Migrant workers	Legend has no employees on a temporary visa	Low
4	Seasonal workforce fluctuation	Legend operations are not seasonal, with consistent workforce turnover during the reporting period	Low
5	Freedom of association	Employees of Legend's Hendon Semiconductors division operate under an Enterprise Bargaining Agreement	Low
6	External auditing	Legend is audited to quality, environmental and safety management standards ISO9001, ISO14001 and AS4801 but is not currently audited by a third party for responsible sourcing	Medium
7	Sector Risk	Legend operates in high-risk sectors including:  Manufacturing Wholesale and Trade	Medium
8	Services engaged by Legend	Legend relies on services including recruitment, legal, cleaning services, construction, property maintenance waste disposal and equipment maintenance. Recruitment, construction and cleaning services are considered particularly high risk. Legend generally has long term relationships with small family businesses or recognised service providers with strong human rights policies.	Low

### Modern Slavery Risks in Our Supply Chain

A significant risk area for Modern Slavery is supply chains. Legend has a diverse supply chain across its group entities and divisions, with approximately twenty main product suppliers that provide lugs and links, nylon cable ties and glands, conduits, battery crimpers, heatshrink and hand tools. Services procured by Legend include recruitment, legal, cleaning services, construction, property maintenance, waste disposal and equipment maintenance.

Due to location, sector and product/service type, Legend has identified the following modern slavery risks in its supply chain.

Risk	Description	Finding	Our Risk Exposure
1	Legend suppliers located Internationally	Legend has suppliers in India, China, Malaysia. See Figure A below.	Medium
2	Sourcing of raw materials	Legend sources processed material stock including:  • Electronics  • Copper  • Tin Plated Copper  • Aluminium  • Nylon  • Protective Equipment  Copper is classed as a medium risk commodity.  Tin, Tungsten, Tantalum and Gold are classed as high to very high-risk commodities. Legend is linked to these raw materials through its business operations and products.	Medium

### Figure A.



### **Effects of COVID-19**

Due to travel restrictions we could not conduct any travel to investigate potential modern slavery risks in our supply chain in medium risk countries such as Malaysia or India. Other COVID-19 effects have been included in relevant sections throughout the description of our Sales Divisions.

# "People Focused Processes and Policies"

### Actions Taken to Assess and Address Modern Slavery Risks in Reporting Period

### Current practices and actions addressing modern slavery

A significant risk area for Modern Slavery is the supply chain. Legend assigned responsibility for modern slavery risk management to the National Quality Manager in February 2020. Following that, a Modern Slavery Risk Assessment and Gap Analysis was conducted to provide Legend with a deep understanding of risk areas in operations and supply chains, and a detailed multi-year action plan.

During the reporting period Legend had in place other policies and processes not specifically aimed at addressing modern slavery risk but that contribute to reducing the risk of Legend contributing to modern slavery in its operations and supply chains.

Processes and Practices in place during the reporting period included:

Regular Supplier Audits	Legend, through its procurement team, conducts regular supplier audits of current and potential suppliers. There is a formal supplier audit questionnaire and process for documenting and recording results. In this reporting period a footprint in China has been established to enable more regular audits  COVID-19 Impact: During FY21 international travel was restricted which prohibited Legend personnel being able to visit our international suppliers. However, our China office, once allowed to travel, was able to continue our supplier audit program
Whistle Blower Policy	Legend has a whistle blower policy and process that allows reporting of grievances to Legend or a 3rd party. This policy was updated and approved in 2021. There was a comprehensive training program given to all Legend people managers. The Whistleblower policy was also disseminated to all employees with a video communications package was internally developed.
Recruiting Policies	Legend has a set of recruitment policies and practices that comply with relevant federal and state regulations

# Modern Slavery Risk-Specific Actions During the Reporting Period

In FY20 Legend identified its obligation to report on modern slavery and its need to improve its practices to develop an effective response to modern slavery risks. Legend engaged an experienced consultant to guide a detailed program of work during the reporting period to develop our understanding of modern slavery risks in our operations and supply chains and our response to ensure a best practice and comprehensive approach.

In FY21 we began the task of implementing the full suite of Action Plan items detailed within our FY20 Modern Slavery Report. Below is our progress to date.

Development	Level of Commitment	Achievements
Policies and commitments		
Review update and formalize modern slavery related responsibilities and accountabilities	Compliance	<b>~</b>
Create 3-year Modern Slavery Action Plan	Beyond Compliance	~
Create a specific Modern slavery or Human Rights Policy covering own operations or update Code of Conduct to include Human Rights related criteria.	Beyond Compliance	~
Board		
Conduct Board Level awareness training to increase awareness of Modern Slavery risks and obligations.	Beyond Compliance	~
Responsibilities: Board		
The Board reviews Modern Slavery Risks regularly during Board Meetings.	Beyond Compliance	~
Management		
Responsibilities: Management		
Introduce Modern Slavery KPIs for Management Personnel (based on 3-year Modern Slavery Action Plan)	Best Practice	~
Ensure specific function for overseeing Modern Slavery within Quality/ Purchasing is documented in position description and official responsibilities	Beyond Compliance	~

### Describe how the reporting entity assesses the effectiveness of these actions

In this period Legend on focused 3 principal areas to address modern slavery risk. The first was to form a Modern Slavery Action Team to implement the action plan which was developed in the workshops conducted in June 2021. The Modern Slavery Action Team acts as an internal mechanism to monitor the action plan implementation within the business and to review these actions once they are in operation. To date the Team has assessed the actions to be effective and within the reporting period there were no events which led to modern slavery being detected or present within our operations or supply chain.

The second item which we implemented was a supplier auditing program operating within the People's Republic of China (PRC). By using our local Chinese procurement capabilities in PRC we began a program of on-site supplier audits which included a modern slavery component and a health and safety component. These audits were documented and extensive visual and written records kept. The audits were conducted in Mandarin and results were shared with and reviewed by the Modern Slavery Action Team. No instances of modern slavery were detected.

The third item which we implemented was a proactive scanning of current media events which may provide trace evidence of the existence of modern slavery within our supply chain. We undertook one investigation into our supply chain of products which may have originated in Xinjiang province. This investigation yielded no evidence of modern slavery.

These three programs above; our Modern Slavery Action Team, our supplier audit program and our proactive scanning of media are the current methods we employ to assess the effectiveness of our modern slavery risk program.

### **Supplier Audits in China**









### The Process of Consultation

Within the Legend business, Legend owns or controls a number of entities for the purposes of the Modern Slavery Act. A number of these entities can be described as "dormant entities" and do not engage in any trading or business activities. This means that many of these entities do not have any operations or supply chains.

Set out in the table below are descriptions and information required by the Modern Slavery Act in respect of the entities that Legend owns or controls.

Entity that Legend owns or controls	Risks of modern slavery practices in the operations and supply chains of the entity	Actions taken to assess and address modern slavery risks in the operations or supply chains of the entity	Process of consultation between Legend and the entity
Legend Corporate Services Pty Ltd (ACN 006 722 292)			Legend owns
System Control Engineering Pty Ltd (ACN 082 835 292)		See "Actions taken to assess and address	all the shares of these entities and the directors of these entities are also directors of Legend. It was therefore not necessary for Legend to
Acculec Pty Ltd (ACN 123 199 833)	See "Modern		
Hendon Semiconductors Pty Ltd (ACN 080 879 616)	Slavery Risks in Legend		
Commsforce Pty Ltd (ACN 103 510 498)	Operations" and "Modern Slavery	modern slavery risks	
MH Legend Power Pty Ltd (ACN 051 792 833)	Supply Chains" in reporting		consult with these entities
System Control Engineering NZ Limited Co#112889	sections above	section above	to obtain the information set out in this Modern Slavery Statement.
Ecco Pacific Limited Co# 895659	-		
M+H Power Pacific Limited Co#1062493			
Legend (Pacific) Pty Ltd (ACN 058 198 075)			
IES Investments Pty Ltd (ACN 105 001 189)	No risk of modern slavery		N/A
Cable Accessories Holdings Pty Ltd (ACN 003 213 358)			
Cable Accessories (Australia) Pty Ltd (ACN 002 184 616)	practices occur in any of		
CABAC Projects Pty Ltd (ACN 117 215 415)	these entities' operations or	N/A	
Acculec Group Pty Ltd (ACN 605 546 469)	supply chains on the basis they are dormant entities		
Circle Power Electrical Data Pty Ltd (ACN 113 923 078)			
MSS Fibre Systems Pty Ltd (ACN 102 221 698)			
Energy Correction Options (ACN 085 765 751)			

### Our Plans for 2022

Legend commenced its action plan in 2021 and included below is a brief summary of the actions in progress or planned for the FY22 period are included below.

For Development	Level of Commitment	Time Frame	
Due Diligence: Supply Chain			
Incorporate Modern Slavery / Human Rights Criteria into audit frameworks across the business	Beyond Compliance	Q2	
Follow up high risk and high priority suppliers with SAQs to further develop supplier risk profiles	Beyond Compliance	Q2	
Create guideline material for suppliers regarding modern slavery. Incorporate into onboarding process	Beyond Compliance	Q1	
Explore supplier platforms that currently exist (e.g. SEDEX, Amfori, Verite)	Beyond Compliance	Q3	
Supply chain transparency exercises (and asking suppliers about their suppliers)	Best Practice	Q3	
Due Diligence: Operations			
Embed Modern Slavery risk into existing Risk Assessment framework / in alignment with Corporate - Wide Risk Assessment Management Framework	Beyond Compliance	Q2	



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